

EXHIBITS FOR MOTION TO RECONSIDER/CORRECT ECF 509

EXHIBIT # 1 Email communication with Gayle Skluzacek RE expert witness reports

EXHIBIT # 2 Email communication with Dr. Jospesh Scelsa RE expert witness reports

**EXHIBIT # 3A Plaintiff ‘s Dec. 8, 2022 Letter to Court Requesting Extension in ECF 330
3B Plaintiff ‘s Dec. 16, 2022 Letter to Court Requesting Extension in ECF 338**

EXHIBIT # 4 Plaintiff’s Sept 28, 2022 email to Anderson Duff.

EXHIBIT #5 Plaintiff two exhibits “Plaintiff’s Illness Beings Dec. 7, 2022 into late Jan. 2023.

EXHIBIT #6 Plaintiff’s Nov. 16, 2022 Email to Settlement Lawyer and Dr.Scelsa

EXHIBIT #7 WorthPoint’s List of Rule 37 Demands due Oct.6, 2020.

EXHIBIT # 8 A Sept. 26, 2022 WorthPoint’s Attorneys emails with Dangerous Warnings

EXHIBIT #8 B SAME EXHIBITS IN 493 filed on June 1, 2023

EXHIBIT # 9 Oct 28, 2022 Proof of sending electronic Raw email dated Feb. 20, 2022 to Will Seippel in a digital PDF formatted file to Defendants.

EXHIBIT # 10 Plaintiff Nov. 8, 2022 letter to the Court correction of Attorneys False and Incorrect Date Stamp Discovery in ECF 310

EXHIBIT #11 Nov, 23 2022 Judge Cave’s Order Feb. 20, 2016 electronic email-WorthPoint

EXHIBIT #12 Nov. 23, 2022 email to Dr. Scelsa—failed settlement talks and expert report

EXHIBIT # 13 NYLAG-email on Expert Witness Reports due before March 1, 2023.

EXHIBIT # 14 Dr. Scelsa ’s award and ceremony for his civic and cultural contributions to the community with Mayor Eric Adams in attendance at the ceremony.

EXHIBIT #15 Gayle Skluzacek NYU Adjunct Professor course curriculum art appraisals.

EXHIBIT #16 July 2023 Letter in Support by Dr. Scelsa for Plaintiff’s Motion to Change or Reconsider expert witness reports

**EXHIBIT #17A Plaintiff email to Defendants upon Dr. Scelsa ’s report Feb. 16, 2022
17B Plaintiff email to Defendants upon Gayle Skluzacek report Feb. 22,2023.**

EXHIBIT #18 ECF 489 page 2 Excerpt from Attorney Anderson Duff Regarding Payment



EXHIBIT #4
AnnamarieTrombetta <atrombettaart@gmail.com>

Re: Activity in Case 1:18-cv-00993-RA-SLC Trombetta v. Novocin et al Letter

Annamarie Trombetta <atrombettaart@gmail.com>
 To: Anderson Duff <ajd@hoganduff.com>
 Cc: "Bialek, Adam" <Adam.Bialek@wilsonelser.com>, "Farmer, Jana S." <Jana.Farmer@wilsonelser.com>

Wed, Sep 28, 2022 at 7:52 AM

Mr. Duff,

On September 22, 2022 you failed to send me a copy of the letter you filed with the Court in Doc. 282 Please explain in detail why you failed to send me a copy when I sent you an email request on September 23, 2022 for Doc. 282 ? To date I still do not have a copy of your Sept. 22nd letter.

As per your request Mr. Duff that was duly written in your email on September 26, 2022--and excerpt is below
If you believe my clients have not fully responded to any of your discovery requests, you are required to describe them to me and let me address them before you file a related motion with the Court.

I believe you and your client have not fully responded to my requests. Attached are three pages of your April 2022 responses.

All Plaintiff's requests were sent in February 2022, from my first set of Interrogatories and Production of Documents due in April 2022.

Interrogatories No. 8 was my request for a written description and the exact location of the signature in red on the back of the 1972 canvas.

In Plaintiff's Production of Documents for Photos was No. 1.3 I asked for the 12 photos from the EAI eBay ad
 In No. 1.4 I requested Full Frontal photos and
 In No.1.5 I requested Full Back photos etc clearly defined on Page 6 to Page 7 .

Also on page 7, Plaintiff requested in No. 1.6 all written proof of membership from askArt.com to verify that Norb and Marie Novocins were clients or subscribers or were members of AskArt . All of these requests were sent to you in February. It is now September

Mr Duff your responses had objections yet also stated that "*Defendants will produce responsive, non-privileged documents in their possession, custody, or control if any exist*". Please produce any and all of the items I have requested and listed above.

I have attached your EAI --Defendants' Responses to Plaintiff's Interrogatories and Plaintiff's Requests for Documents and Photos.

To Reiterate:

1--I am requesting a written response to this email. Plaintiff is requesting the production of these documents immediately, we are nearing the end of Discovery.

2--If you cannot produce my requests to Page 6 Request No. 1.3 Page 6 Request No. 1.4 and Page 6 Request No. 1.5 and Page 7 No.1.6 please explain why.

3-- If you fail to produce the requests at this time, Plaintiff reserves the right to prevent any further or future production of any photos or written documents in the future of this litigation.

As per all the Defendants' request to Meet and Confer this week ending on the 30th of September, my schedule is fully booked.

Submitted September 28, 2022

Annamarie Trombetta

Exhibit F#42

3 attachments

- #1 EAI Defendants Responses First Set of Production of Documents and Photos Page 6.pdf
482K
- # 2 EAI Defendants Responses First Set of Production of Documents and Photos Page 7.pdf
478K
- # 3 EAI Defendants Responses First Set of Interrogatories Page 7 No.8.pdf
519K

Exhibit # 5 Plaintiff's Illness Beginning

December 7, 2022 into late January 2023



#5

Annamarie Trombetta <atrombettaart@gmail.com>

CV-18-00993 Plaintiff Annamarie Trombetta-Sudden Flu
1 message

Annamarie Trombetta <atrombettaart@gmail.com>
To: Cave NYSD Chambers <Cave_NYSDChambers@nysd.uscourts.gov>

Sun, Dec 11, 2022 at 11:48 PM

To the Honorable Judge Cave,

I am presently very ill with a stomach flu which came upon me this morning and has not improved.

May I ask for a brief extension--to recover.
My submission is due Dec 12th
however, it is difficult to stand upright

Kindly convey your decision at your earliest convenience.

Respectfully,
Annamarie Trombetta
Tel (212) 427-5990

#5



Physician Partners

Name: ANNAMARIE TROMBETTA
Address: 175 E 96TH ST APT 12R
NEW YORK, NY 10128

MRN: 123-456
DOB: 05/05/1963

To Whom it May Concern:

Ms. Annamarie Trombetta was seen and evaluated in the office on 1/12/23 for fatigue and possible covid related syndrome.

Sincerely,

Christine Miglino, DO

Electronically signed by : CHRISTINE MIGLINO, MD; May 16 2023 9:34AM EST (Author)



Annamarie Trombetta <atrombettaart@gmail.com>

Annamarie Trombetta ---Lawsuit

3 messages

Annamarie Trombetta <atrombettaart@gmail.com>

To: /

@~~ebay~~law.com>, jvselsa@italianamericanmuseum.org

Wed, Nov 16, 2022 at 10:50 AM

To d Dr. Scelsa,

Thank you for taking the time to listen to my legal plight. I appreciate the introduction to ~~Andrea~~, Dr. Scelsa and I am truly grateful for your involvement.

As I stated, I needed to access my every changing legal situation regarding outstanding Discovery. To date, the eBay email receipt for the sale of the misattributed 1972 Oil Painting has not been produced in its entirety. The second Defendants (WorthPoint) have called for the full production in their Deposition which is due this week. For the Record--I have attached it within this email if you care to review it which is not confidential. This receipt is devoid of the gray image icon and cut off on the right side.

Last week I filed three letters with the Court in New York. On Monday I had to file a response with the Court in the State of Georgia for a premature false filing for an entry of Motion for Default by WorthPoint for IIED. These tasks have delayed my response and outreach in contacting to the both of yo ~~the~~ ~~in~~ ~~she~~ Court in New York, ~~the~~ ~~she~~ Conference call for the 23rd of November.

I will know upon the conclusion of this phone conference if I ~~want~~ ~~at~~ settle this lawsuit and hire ~~Andrea~~ at this time. My intuition right now is telling me that ~~without~~ ~~the proof of the eBay sale, any attempt at settlement might be premature.~~ I will know for certain on the 23rd after the Conference call.

I appreciate your patience regarding this lawsuit and what has become a true ordeal.

With Respect and Gratitude,
Annamarie Trombetta

Ebay Item Sold for 1972 Painting --EAI000058-EAI000059.pdf
107K

~~Andrea Natalie~~ <~~candice~~.Openlaw.com>
To: Annamarie Trombetta <atrombettaart@gmail.com>
Cc: jvselsa@italianamericanmuseum.org

Wed, Nov 16, 2022 at 10:58 AM



EXHIBIT
7
Nicole Haimson
518.320.3608 (direct)
Nicole.Haimson@wilsonelser.com
Page 1

September 22, 2022

Via E-Mail

atrombetttaart@gmail.com

Annamarie Trombetta
175 East 96th Street
Apt. 12R
New York, NY 10128

Re: *Annamarie Trombetta v. Norb Novocin, et.al.*
Civil Action No.: 1:18-cv-00993-RA-SLC
Our File No.: 19701.00006

Dear Ms. Trombetta,

As you are aware, our firm represents WorthPoint Corporation ("WorthPoint") in connection with the above-captioned litigation.

We write to address several deficiencies in your responses to the WorthPoint's various discovery demands. Please also consider this a request to meet and confer pursuant to Federal Rules of Civil Procedure ("FRCP") Rule 37(a)(1), and to provide us with some dates in the next week when you are available to discuss.

WorthPoint's Demand for Documents

Apart from our prior discussions about your deficiencies, we have noted the following additional deficiencies in your responses to WorthPoint's Request for Production (where applicable, our demand is followed by the claim of your deficiency):

The following documents you have produced appear to be incomplete and/or missing pages:

- **Plaintiff's Google Evidence¹ 011-** pages 2-3 missing
- **Plaintiff's Google Evidence 012-** pages 2-3 missing
- **Plaintiff's Google Evidence 013-** page 2 missing
- **Plaintiff000018-** pages 1-2 and 4-7 missing
- **Plaintiff000021-** page 2 missing

¹ While you have named this document as evidence, WorthPoint does not concede that it is evidence in an admissible form, and our reference to the document should not be deemed as such. We are merely using your nomenclature. WorthPoint reserves the right to object to your introduction of any document that does not meet the requirements of the Federal Rules of Evidence.

150 East 42nd Street • New York, NY 10017 • p 212.490.3000 • f 212.490.3038

Alabama • Albany • Atlanta • Austin • Baltimore • Beaumont • Boston • Chicago • Dallas • Denver • Edgewoodsville • Garden City • Hartford • Houston
Indiana • Kentucky • Las Vegas • Landon • Los Angeles • Miami • Michigan • Milwaukee • Mississippi • Missouri • Nashville • New Jersey • New Orleans
New York • Orlando • Philadelphia • Phoenix • San Diego • San Francisco • Sarasota • Stamford • Virginia • Washington, DC • Wellington • White Plains

wilsonelser.com

EXHIBIT



17 - 2 -
page 2

- Plaintiff000037-Plaintiff000049- page 14 missing
- Plaintiff000051B- page 2 missing
- Plaintiff000052- page 2 missing
- Plaintiff000053- page 2 missing
- Plaintiff000054- page 2 missing
- Plaintiff000055- page 2 missing
- Plaintiff000056- page 2 missing
- Plaintiff000057- page 2 missing
- Plaintiff000058- page 2 missing
- Plaintiff000059- pages 1 and 3 missing
- Plaintiff000060- page 2 missing
- Plaintiff000062- page 2 missing
- Plaintiff000063- page 2 missing
- Plaintiff000064- pages 2-10 missing
- Plaintiff000065- page 2 missing
- Plaintiff000066- page 2 missing
- Plaintiff000067- page 2 missing
- Plaintiff000068- page 2 missing
- Plaintiff000069- pages 1 and 4-7 missing
- Plaintiff000075- page 2 missing
- Plaintiff000085- incomplete, unknown number of pages missing
- Plaintiff000087- incomplete, unknown number of pages missing
- Plaintiff000087 (2)- pages 1 and 3-7 missing
- Plaintiff000135- page 2 missing
- Plaintiff000140-Plaintiff000141- pages 3-5 missing
- Plaintiff000146- incomplete, unknown number of pages missing
- Plaintiff000147- pages 2-3 missing
- Plaintiff000148- page 2 missing
- Plaintiff000152- page 2 missing
- Plaintiff000157-Plaintiff000158- pages 3-7 missing
- Plaintiff000159- pages 1-2 and 4-7 missing
- Plaintiff000161- incomplete, unknown number of pages missing
- Plaintiff000162- incomplete, unknown number of pages missing
- Plaintiff000169- pages 1-2 and 4-7 missing
- Plaintiff000173- incomplete, unknown number of pages missing
- Plaintiff000179-Plaintiff000184- page 4 missing
- Plaintiff000191-Plaintiff000192- pages 2-3 missing
- Plaintiff000193-Plaintiff000194- page 3 missing
- Plaintiff000195- page 2 missing
- Plaintiff000200- page 2 missing
- Plaintiff000202- pages 1-2 and 4-8 missing
- Plaintiff000217- pages 2-4 missing
- Plaintiff000218- pages 2-4 missing
- Plaintiff000219- pages 2-4 missing
- Plaintiff000223- page 2 missing



- 3 -

- Plaintiff000227- pages 1-3 and 5 missing
- Plaintiff000229- page 2 missing
- Plaintiff000268- pages 1 and 3 missing
- Plaintiff000270- page 2 missing
- Plaintiff000271- pages 2-3 missing
- Plaintiff000273- page 2 missing
- Plaintiff000274- incomplete, unknown number of pages missing
- Plaintiff000277- incomplete, unknown number of pages missing
- Plaintiff000282- page 2 missing
- Plaintiff000282- pages 2 and 4 missing
- Plaintiff000291- incomplete, unknown number of pages missing
- Plaintiff000295-Plaintiff000296- incomplete, unknown number of pages missing
- Plaintiff000297- page 2 missing
- Plaintiff000306- page 2 missing
- Plaintiff000297- pages 2-3 missing
- Plaintiff000313-Plaintiff000314- pages 2 and 4-5 missing
- Plaintiff000317- page 2 missing

*Exhibit
7*

Page 3

Please produce the full and complete version of these documents as soon as possible. To the extent that Plaintiff fails to produce the complete document, we reserve the right to object to the introduction of any such document.

Request No. 13: Copies of Plaintiff's tax returns from 2010 to present.

Response to Request No. 13: You initially objected to this Request, which calls for information which is relevant and necessary for an analysis of alleged damages in this matter. To date the only tax returns you have produced are from 2000 and 2003. To the extent you are seeking damages in this lawsuit for alleged lost profits and diminution in earnings, as the Operative Complaint seems to imply, it is imperative that you provide us with your full tax returns from 2010 to present and provide us with duly executed unrestricted authorizations enabling us to inspect, examine and copy such IRS records. Further, to the extent you are in possession of such information and records and intentionally withhold same, or you attempt to introduce such damages at trial without producing the requested documentation, we will move to preclude you from relying upon any such information in motions and at trial.

Request No. 18: Copies of any receipts or proofs of any damages Plaintiff claims she suffered as alleged in this lawsuit.

Response to Request No. 18: You initially objected to this Request, which calls for information which is relevant and necessary for an analysis of alleged damages in this matter. To date, the only medical records you have produced are billing statements from Altman Physical Therapy Center and Russell Silver, MD. To the extent you are seeking damages in this lawsuit for alleged physical damages, including emotional distress, as the Operative Complaint seems to imply, it is imperative that you provide us with any medical records proving you suffered such alleged damages and provide us with duly executed unrestricted authorizations enabling us to inspect, examine and copy such records for all treating providers. In addition, we await further particularization, including medical reports, indicating the damages you claim you sustained and the causation element the physicians attribute to our client's conduct.

EXHIBIT #7



- 4 -

Further, to the extent you are in possession of such information and records and intentionally withhold same, or you attempt to introduce such damages at trial without producing the requested documentation, we will move to preclude you from relying upon any such information in motions and at trial.

page
4

We also note that we have recently forwarded to you your deposition transcript. During the deposition, we made certain requests. These requests are noted at the end of the deposition, and we request that you provide the documents and information requested.

We further note that there may be other issues with your responses and WorthPoint reserves the right to seek further responses as the need arises or becomes clear, and therefore reserves its rights accordingly.

We request that you confirm that you will provide the requested information and documents by no later than October 6, 2022. If there is an issue in meeting this deadline or providing complete responses to the requests itemized above, please let us know when you will be available for a Meet and Confer within the next week.

Thank you in advance for your attention and anticipated cooperation with respect to this matter. Should you have any questions or comments, please let us know.

Very truly yours,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

/s/Nicole Haimson/

Nicole Haimson

cc: All counsel

Trombetta v. EAI et al - Copy of Docket #285

Inbox ✉

Farmer, Jana S.
To me, Anderson, Adam, Nicole, Jana



This message seems dangerous

Similar messages were used to steal people's personal information. Avoid clicking links, downloading attachments, or replying with personal information.

Looks safe

Dear all,

2 Attachments • Scanned by Gmail

⚠ Downloading these attachments is disabled. This email has been identified as phishing. If you want to download these and you trust this message, click "Looks safe" in the banner above.

PDF Letter to Magistr...

Activity in Case 1...

~~EE-11-100~~
EE-11-100
Sept 26, 2022 at 9:02 PM

RE: Trombetta- WE File: 19701.000006

Inbox x

Haimson, Nicole

to me, Adam, Jana, Anderson



This message seems dangerous

Similar messages were used to steal people's personal information. Avoid clicking links, downloading attachments, or replying with personal information.

Looks safe

Ms. Trombetta,



Mon, Sep 26, 12:46 PM (20 hours ago)



⚠️ Downloading this attachment is disabled. This email has been identified as phishing. If you want to download it and you trust this message, click "Looks safe" in the banner above.


E. H. Hillit
Sept. 26, 2023
at 12:46 PM

 Trombetta Suppl...

EXHIBIT

8B
1

**SEPTEMBER 2022 WORTHPOINT SENT EMAILS TO PLAINTIFF
CAUSE PLAINTIFF'S COMPUTER TO FREEZE AND UNABLE TO
USE OR SIGN OUT OF MY GMAIL ACCOUNT SEPT. 26, 2022,**

288 09/28/2022 MEMO ENDORSEMENT on re: [287] Letter bringing to the Court's attention two emails sent on September 26, 2022, filed by Annamarie Trombetta.

ENDORSEMENT: The Court cannot explain why Ms. Trombetta is receiving the warnings that appear at ECF Nos. 287-1 287-4 when Defendants attempt to send her emails related to this case, except to say that the Court does not infer any bad faith or intent by Defendants. If Ms. Trombetta does not wish to receive communications from Defendants about this case via email, she may designate another means of communication, but that is entirely her choice, and does not require the Court's involvement. The Clerk of Court is respectfully directed to mail a copy of this Order to Ms. Trombetta at the address below. Mail To: Annamarie Trombetta, 175 East 96th Street (12R), New York, NY 10128. SO ORDERED. (Signed by Magistrate Judge Sarah L Cave on 9/28/22)

SEPTEMBER 19, 2022

ESTATE AUCTIONS INC. AND ATTORNEY ANDERSON DUFF FAILED TO PRODUCE A COMPLETE 2012 EBAY SALES RECEIPT SENT BY EBAY TO NORB NOVOCIN ON DECEMBER 1. 2012

280 09/19/2022 LETTER addressed to Judge Ronnie Abrams from A. Trombetta, dated 9/19/22 re: 1) WORTHPOINT ATTORNEYS' FAILURE TO PRODUCE PLAINTIFF'S DEPOSITION TAKEN ON 8/30/22. 2) AFTER 8/30/22 DEPOSITION, PLAINTIFF WAS IMPROPERLY SERVED A SUMMONS & COMPLAINT IN GEORGIA BY WORTHPOINT CORP. WILLIAM & SHARI SEIPPEL SUBJECT OF COMPLAINT EMOTIONAL DISTRESS & HARASSMENT DUE TO PLAINTIFF'S DIRECT COPYRIGHT, VARA, DMCA INFRINGEMENT LAWSUIT 3) AS PER DOC. 268, I SEEK TO AMEND MY PROPOSED AMENDED COMPLAINT TO INCLUDE FRAUD, HARASSMENT, EMOTIONAL DISTRESS, VIOLATION OF CIVIL RIGHT FOR A FAIR TRIAL, RIGHT TO SEEK GAINFUL EMPLOYMENT. Document filed by Annamarie Trombetta.

5 Attachments ▼

WORTHPOINT'S FAILS TO PRODUCE PLAINTIFF' DEPOSITION 9/19/2022

278 09/16/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta, dated 9/16/212 re: 1-DEFENDANTS' FAILURE TO OBEY JUDGE CAVE'S ORDER FOR THE PRODUCTION OF RESPONSES TO PLAINTIFF'S THIRD SET OF INTERROGATORIES & PRODUCTION OF PHOTOGRAPHS & DOCUMENTS. 2-PLAINTIFF'S REQUEST TO JUDGE CAVE TO ORDER DEFENDANTS TO PRODUCE REPOSTIES & PHOTOS. Document filed by Annamarie Trombetta.

1 Attachment ▼

EXHIBIT #8B**2**

- 307** 10/31/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta, dated 10/31/22 re: "MEET & CONFER ON 10/28/22 WITH DEFENDANTS; PLAINTIFF'S 10/31/22 LETTER TO DEFENDANT'S ATTORNEYS AT 9 A.M. REQUEST OF COMMUNICATION AT 11 AM & 1 PM & 3 PM; PLAINTIFF'S SINGLE FILING OF LETTER TO THE COURT ON MY FACT DISCOVERY RESPONSES." Document filed by Annamarie Trombetta.

2 Attachments ▾

OCTOBER DEPOSITION AND DELAYS

WORTHPOINT ATTORNEYS FAILED TO SENT SUBPOENA TO PLAINTIFF'S WITNESS VANESSA PLOSKI ON OCT. 7, 2022

**VANESSA PLOSKI DEPOSITION'S POSTPONED TO OCT. 17, 2022
A LOSS OF 10 DAYS**

WORTHPOINT ATTORNEYS SEND SUBPOENA TO DISCARDED

- 292** 10/07/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from Annamarie Trombetta dated 10/7/2022 re: Pro Se Plaintiff respectfully sets forth this letter to inform and affirm to the Court, a pattern of willful misinformation, intimidation and harassment repeatedly demonstrated by the WorthPoint's attorneys. take any actions legally possible. Document filed by Annamarie Trombetta.

1 Attachment ▾

- 289** 10/06/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta, dated 10/6/22 re: "10/4/22 MEET & CONFER - REQUEST TO UPDATE SCHEDULE - BAD FAITH TOWARDS WITNESS" - Pro Se Plaintiff informs the Court that this week the plaintiff requested a Meet and Confer with both of the defendants' attorneys as per your order dated 9/27/22 in Document 287 etc. At the Meet and Confer, I did ask if the Novocin deposition that occurred on 9/21/22 was completed. I regret to state that it is not. Plaintiff reminds the Court that my deposition was on 8/30/22, three weeks before the Novocin's deposition etc. Document filed by Annamarie Trombetta.

4 Attachments ▾

LJH/B/T/H/B3

**NOVEMBER 2022 WORTHPOINT FALSELY CLAIMS PLAINTIFF' DISCOVERY
WAS NOT PRODUCED
ON NOVEMBER 16, 2022 SECOND PRODUCTION OF EAI EBAY SALES RECEIPT**

316 11/18/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta, dated 11/18/22 re: "PLAINTIFF DECLINE TO WITHDRAW MY DISCOVERY REQUESTS TO BOTH DEFENDANTS" - I realize that both Judge Cave and Judge Abrams have other cases, yet the deliberate refusal to produce my Discovery requests has been ongoing for quite some time. Document filed by Annamarie Trombetta.

313 11/11/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta, dated 11/11/22 re: OUTSTANDING WORTHPOINT CORP. DISCOVERY DEFICIENCIES RULE 37 REQUESTS 1) PLAINTIFF REQUESTS FOR THE OUTSTANDING PRODUCTION FOR PROOF OF RECORDS OF EMPLOYMENT & TERMINATION DATES OF WORTHPOINT WEBMASTER GREGORY WATKINS & ANITA BROOKS. 2) PLAINTIFF'S FOURTH SET OF SUPPLEMENTAL RULE 37 LETTER - SECOND REQUEST FOR PRODUCTION. Document filed by Annamarie Trombetta.

312 11/10/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta, dated 11/10/22 re: OUTSTANDING DISCOVERY DEFICIENCIES BY ESTATE AUCTIONS INC. 1)OUTSTANDING PRODUCTION FOR THE FULL ESTATE AUCTIONS INC. EBAY CONFIRMATION OF THE ALLEGED SALE OF THE "1972 ORIGINAL PAINTING TITLED MAN WITH RED UMBRELLA" WHICH WAS MISATTRIBUTED AS BEING ANNAMARIE TROMBETTA; 2) PLAINTIFF'S REQUEST FROM NORB NOVICIN FOR BUYER'S SALES RECEIPT & THE FORM OF PAYMENT FOR THE 1972 OIL PAINTING SHE PURCHASED ON EBAY FROM ESTATE AUCTIONS INC. IN 2012. Document filed by Annamarie Trombetta.

1 Attachment ▾

310 11/08/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta, dated 11/8/22 re: "PLAINTIFF'S RESPONSES TO DEFENDANT WORTHPOINT'S ATTORNEY'S DISCOVERY STATUS LETTER" - Plaintiff reminds the Court that this statement was made after Plaintiff has produced in Discovery my signature in script and print around the year 1972, which conclusively proves I did not create or sign either signature which exists on the front or back of the 1972 oil painting. Document filed by Annamarie Trombetta.

1 Attachment ▾

DECEMBER 2022

EXH(B)T#SB

4

EAI FAILED TO PRODUCE RAW NATIVE ELECTRONIC EBAY EMAIL FROM EBAY TO NORB NOVOCIN DECEMBER 1, 2012

- 320** 12/01/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta dated 12/1/22 re: "PLAINTIFF'S FOLLOW-UP TO 11/23/22 CONFERENCE CALL - RE DEFENDANTS EAI EVIDENCE"-This letter references and intends to educate the Court on recent questionable information, produced to me via email, as Defendants' evidence etc. Document filed by Annamarie Trombetta.

1 Attachment ▾

- 322** 12/05/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta dated 12/5/22 re: "PLAINTIFF'S FOLLOW-UP TO 11/13/22 CONFERENCE CALL RE WORKPOINT DEFENDANTS" - Plaintiff extends another letter to the Court due to numerous difficulties, deficiencies and the decoding of evidence emailed to the plaintiff by the defendants after the Conference Call last 11/23/22. Document filed by Annamarie Trombetta.

5 Attachments ▾

- 330** 12/08/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta dated 12/8/22 re: APPLICATION TO THE COURT FOR AN EXTENSION FOR EXPERT WITNESS REPORTS. Document filed by Annamarie Trombetta.

1 Attachment ▾

- 331** 12/09/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta, dated 12/9/22 re: EAI FAILURE TO PRODUCE NATIVE ELECTRONIC FULL RAW EMAIL MESSAGE ENVELOPE IN A PDF FORMAT FOR EAI 12/1/22 EBAY EMAIL SALES RECEIPT 1972 ORIGINAL OIL PAINTING MAN WITH RED UMBRELLA. Document filed by Annamarie Trombetta.

6 Attachments ▾

Exhibit C7

#8B
5

DECEMBER 2022

EAI FAILED TO PRODUCE RAW NATIVE ELECTRONIC EBAY EMAIL FROM EBAY TO NORB NOVOCIN DECEMBER 1, 2012

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1 Attachment ▾

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5 Attachments ▾

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6 Attachments ▾

EXHIBIT 8 B 6

DECEMBER 11, 2022

**PLAINTIFF CONTACTED COURT CHAMBERS
DUE TO ILL HEALTH**

332 12/12/2022 ENDORSED LETTER addressed to Magistrate Judge Sarah L. Cave from Annamarie Trombetta dated 12/11/22 re: requesting an extension of time.
ENDORSEMENT: On Sunday, December 11, 2022, pro se Plaintiff Annamarie Trombetta ("Ms. Trombetta") emailed Chambers requesting an extension of time to satisfy her obligations pursuant to the Court's scheduling order (ECF No. 308). Ms. Trombetta's request is GRANTED, and an order providing an extension of time to file her (i) motion to amend the complaint and (ii) expert disclosures pursuant to Federal Rule of Civil Procedure 26(a) (2) shall be issued separately. Ms. Trombetta is advised that, in accordance with the Courts Individual Rules of Practice, communications with the Court including from a pro se party must be by letter-motion filed on the docket.

SO ORDERED /Signed by Magistrate Judge Sarah L. Cave on 12/12/22

339 12/16/2022 LETTER addressed to Magistrate Judge Sarah L. Cave from A. Trombetta, dated 12/15/22 re: "PLAINTIFF'S REQUEST TO RECONSIDER PRODUCTION FOR NATIVE ELECTRONIC MESSAGE EAI 2012 EAI 2012 EBAY SALE" - In September 2022, Plaintiff subpoenaed the person in possession of the painting. The red signature is located midway on the top stretcher bar. A supporting fact that a nine year old could not sign on the top stretcher bar. On 11/23/22, the Court ordered Plaintiff's simple request for one exported PDF Original Message. I explained then how to export the Original message t PFF. Why is Mr. Duff willfully avoiding production?

2 Attachments ▼

RAW META DATA EMAIL dated February 20, 2016 from Plaintiff to WorthPoint @ TWO email addresses**Annamarie Trombetta <annamarietrombettalegal@outlook.com>****Fri 10/28/2022 2:31 PM****To: Farmer, Jana S. <Jana.Farmer@wilsonelser.com>; Adam Bialek <adam.bialek@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>; ajd@hoganduff.com <ajd@hoganduff.com>****1 attachments (4 MB)****February 20, 2016 Email from Annamarie Trombetta to Will Seippel rawplaintext.txt.pdf;**

Attached is the PDF version of the RAW TEXT and Meta Data email to Will Seippel and Greg Watkins dated February 20, 2016.

EXHIBIT
9 A

Date
Oct. 28, 2022

EXHIBIT #11

319 11/23/2022 ORDER: Pursuant to the telephonic discovery conference held today, November 23, 2022 (the "Conference"), the Court orders as follows: 1. Defendants Norb Novocin, Marie Novocin, and Estate Auctions Inc. (together, the "EA I Defendants") shall produce to pro se Plaintiff Annamarie Trombetta ("Ms. Trombetta"), the following: a. the eBay receipt of the 2012 sale of the 1972 original oil painting, in the native electronic format; and b. documentation of the medium by which the transaction occurred (i.e., Paypal, credit card, check, etc.), to the extent such information exists. 2. Defendant Worthpoint Corporation ("Worthpoint," together with the EA I Defendants, the "Defendants") shall produce to Ms. Trombetta the last known contact information for Greg Watkins and Anita Brooks. 3. Ms. Trombetta's request for EA I's 2012 tax returns and information relating to its computer server is DENIED. 4. As a result of Ms. Trombetta's representations at the Conference concerning the damages she is seeking in this action, Worthpoint's requests for Ms. Trombetta's tax and medical records, and sales records from 2018 through 2021, are DENIED WITHOUT PREJUDICE. 5. Ms. Trombetta shall produce to Defendants, the following: a. the February 20, 2016 email and attachments in native electronic format; and b. all communications Ms. Trombetta has had with any non-party witnesses relevant to the claims or defenses in this action. 6. The parties shall produce the documents set forth in this Order by no later than December 2, 2022. 7. Defendants shall order a transcript of the Conference and file it on the docket. The parties shall submit a single request to: etranscripts@nysd.uscourts.gov by Monday, November 28, 2022. The Clerk of Court is respectfully directed to mail a copy of this Order to Ms. Trombetta at the address below. SO ORDERED. (Signed by Magistrate Judge Sarah L. Cave on 11/23/2022)

Second
Defendant's Request
Electronic Email Feb 20, 2016

EXHIBIT # 10

SEE DIGITAL FILE

Plaintiff Nov. 8, 2022 letter to the Court
correction of Attorneys False and Incorrect

Bate Stamp Discovery in
ECF 310



Annamarie Trombetta <artofannamarie@gmail.com>

Annamarie Trombetta

Annamarie Trombetta <artofannamarie@gmail.com>
To: scelsa/joseph <jvscelsa@italianamericanmuseum.org>

Wed, Nov 23, 2022 at 1:15 PM

Email After
Nov 23 Call

Hello Dr. Scelsa,

I wanted to wish you a Happy Thanksgiving . I also wanted to touch base with you about my case.

At the end of the Conference Call today I mentioned a Settlement Conference to the Judge and both Defendants declined any offers.

I also stated to the Judge that the Expert witness reports which are due on December 12, 2022 but that with the Holiday Season this may not be possible.

I have to make an application to the Court for an extension.

When you can please call me to discuss the production of the report.

With Appreciation,
Annamarie Trombetta
Tel (212) 427-5990

EXHIBIT
#12

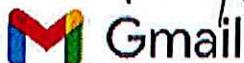


EXHIBIT #3

Annamarie Trombetta <artofannamarie@gmail.com>

Translation of Judge Cave's Order

Annmarie Trombetta <artofannamarie@gmail.com>
To: ~~Hans Homo~~ ~~shapiro@nylag.org~~

Tue, Jan 24, 2023 at 9:54 PM

Hello ~~Hans~~.

I am in need of a translation of Judge Cave's new Order.

I filed a letter on Jan. 23, 2023 Doc 359.

I had asked the Judge if I can submit my expert witness reports. I have read her Order 3 times and still am not clear. I believe Judge Cave will allow me to submit my expert witness reports. I do not know when I have to submit my expert reports and how much time is needed for the Defendants would need to respond.

I looked up Dauberts Motions -- It is raised before or during trial, to exclude the presentation of unqualified evidence to the jury. Daubert motion is used to exclude the testimony of an expert witness does not possess the requisite level of expertise or used questionable methods to obtain data.

I could you a phone call to review what is needed and how to avoid problems.

The parties will simultaneously exchange rebuttal expert disclosures required by Federal Rule of Civil Procedure 26(a)(2) on Tuesday, February 7, 2023

Please explain and or if possible schedule a phone call.

With Appreciation,
Annmarie Trombetta
Tel 212 427-5990

361. ORDER terminating [360] LETTER MOTION for Conference to preclude expert, extend expert discovery deadline, to preclude claim of emotional distress and respond to court order (Dkt. 358) and plaintiff's letter (Dkt. 359) addressed to Magistrate Judge Sarah L. Cave. The Court is in receipt of pro se Plaintiff Annmarie Trombetta's ("Ms. Trombetta") letter dated January 23, 2023, (ECF No. 359), and Defendant WorthPoint's letter dated January 24, 2023, (ECF No. 360), and orders as follows: 1. All discovery, including expert discovery, shall be completed by Wednesday, March 1, 2023. By Wednesday, March 8, 2023, the parties shall file a joint-letter (i) certifying the completion of all discovery, and (ii) stating which dispositive motions, if any, each party intends to file. 2. Depositions of experts shall be completed by Wednesday, March 1, 2023. 3. The parties will simultaneously exchange rebuttal expert disclosures required by Federal Rule of Civil Procedure 26(a)(2) on Tuesday, February 7, 2023. 4. Any applications to exclude expert testimony (i.e., Daubert motions), may be appropriately raised after the parties have completed expert discovery. The Clerk of Court is respectfully directed to (i) close ECF No. 360, and (ii) mail a copy of this Order to Ms. Trombetta at the address below. SO ORDERED. Mail To: Annmarie Trombetta, 175 East 96th Street, Apt 12R, New York, New York 10128. (Signed by Magistrate Judge Sarah L Cave on 1/24/2023) (filed: 01/24/2023)



EXHIBIT

Annamarie Trombetta <artofannamarie@gmail.com>

From NYLAG

Translation of Judge Cave's Order

Hans Romo <HRomo@nylag.org>
To: Annamarie Trombetta <artofannamarie@gmail.com>

Hi Ms. Trombetta,

Mon, Jan 30, 2023 at 3:51 PM

You should make your expert disclosures as soon as possible to make sure that expert depositions can take place by the March 1 deadline.

The rebuttal expert disclosures are those discussed in Rule 26(a)(2)(D)(ii). They are for any expert testimony you will offer to rebut expert testimony that the other side has disclosed.

Dispositive motions are those that would decide the case. Here, that likely means motions for summary judgment. You do not need to file the actual motion on March 8. You only need to tell the judge if you're going to move for summary judgment on that date.

-Hans

~~Hans Romo~~

Staff Attorney, S.D.N.Y. Pro Se Legal Clinic
New York Legal Assistance Group
(212) 659-6192

From: Annamarie Trombetta <artofannamarie@gmail.com>
Sent: Friday, January 27, 2023 10:09 AM
To: Hans Romo <HRomo@nylag.org>
Subject: Fwd: Translation of Judge Cave's Order

[Quoted text hidden]

This email, including any attachments, may contain information that is legally privileged and/or confidential. If you are not the person this email was intended to reach, then do not share, distribute, or copy it. Please notify the person who sent this email immediately and then delete the email, including any attachments.

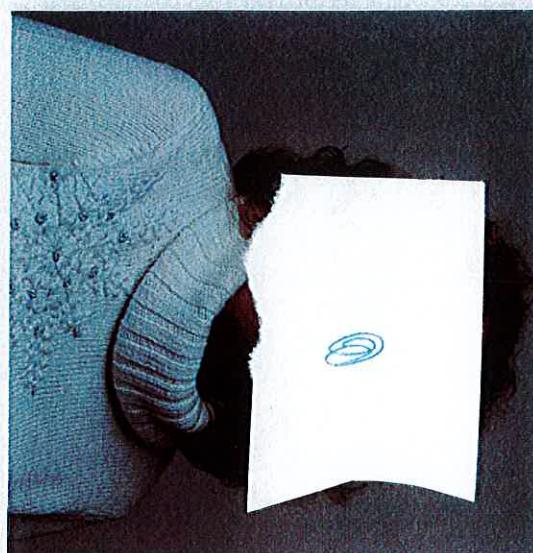
EXHIBIT 14







FACULTY >


NYU | CONTINUING
EDUCATION
SCHOOL OF PROFESSIONAL STUDIES
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GAYLE SKLUZACEK

ADJUNCT ASSISTANT PROFESSOR

Gayle Skluzacek is the president of the full-service appraisal firm Abigail Hartmann Associates, which specializes in fine and decorative arts, wine, and jewelry. It has catalogued important collections, estates, and archives; identified lost masterpieces; served as an art/personal property expert in court cases; and worked closely with major museums in their art acquisition programs. Skluzacek was the first certified wine appraiser accepted by a major appraisal association in the U.S. She is also a certified appraisal member in American Art and Prints. Through NYU and the AAA, Skluzacek coauthored the first course on uniform standards of professional appraisal practice for personal property appraisers in the U.S. She served on the board of directors of the AAA from 1992 to 2010 and was its president from 2000 to 2002. In 2015 she was awarded its Director's Award for her service to the appraisal profession.

PAST COURSES

ITALIAN AMERICAN MUSEUM

Exhibit A

Joseph V. Scelsa, Ed.D.

Founder and President

jvscelsa@

italianamericanmuseum.org

T 212 965 9000
C 917 642 4922

151 Mulberry Street
New York, NY 10013

RE: Expert Witness Testimony for Artist Annamarie Trombetta Case :0993

July 3, 2023

To the Honorable Chief Judge Laura Taylor Swain:

I am writing on behalf of artist, Annamarie Trombetta who had a solo exhibition at the Italian American Museum (IAM) in 2015. Ms. Trombetta has unfortunately been misattributed as the artist who painted a damaged oil painting, allegedly created in 1972. She could not have painted this painting since she was a small child. What makes this claim even more ridiculous is the size of the damaged painting which is roughly four feet high, taller than her size at that age.

It behooves me to inform Your Honor that these companies also associated the Italian American Museum with their fraudulent painting. Annamarie's 2015 exhibit at IAM was linked to this fraudulent internet listing. As the director of the Museum, I find such associations to be unethical aside from being false and unwanted.

I have written many letters on behalf of Ms. Trombetta regarding this prolonged legal matter and find the extent of work imposed on Ms. Trombetta to be excessive and harmful to her health. I have been counseling her by phone and I am concerned for her well being as I am a licensed Mental Health Counselor in New York State.

On May 31, 2023, I wrote a letter in support, including my expert witness report that I submitted in February 2023. I did so because Ms. Trombetta and her talent have been damaged by this unfortunate internet link. I know Ms. Trombetta to be kind, patient and tolerant. She did inform me that she contacted the companies many times before her lawsuit. I support her efforts to protect her name and professional contacts which were adversely affected by this public display of a forged signature next to her biography. This type of public display can affect the prices of her artworks and her livelihood.

In my last letter, I affirmed that Ms. Trombetta was not in any way negligent in pursuing my testimony. My schedule is consistently quite full, as the Museum is

Administrative Office
1806 Hering Avenue
Bronx, NY 10461

www.ItalianAmericanMuseum.org

ITALIAN AMERICAN MUSEUM

Exhibit B

currently under construction and I am busy preparing for its reopening, hopefully this year.

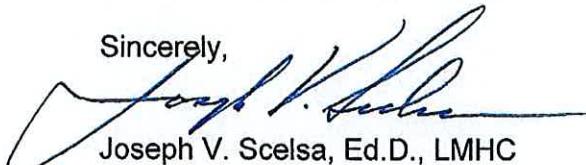
In September 2022 we did meet in person. At that time, I suggested settling her lawsuit and furnished Ms. Trombetta with the name of an attorney. She immediately contacted him. On November 23, 2022, Ms. Trombetta sent me an email updating me on her case and the need to write her report. Due to unexpected circumstances detailed in my letter dated May 31, 2023, I was unable to accommodate her deadline of December 2022. I affirm that I asked Ms. Trombetta to request an extension to fulfill the requirements for my expert witness report which are quite specific.

As a Mental Health Counselor, I impress upon the Court the anguish and stress that has been put upon Ms. Trombetta due to this fake oil painting she did not paint. It would be a great hindrance to Ms. Trombetta if I were not permitted to give testimony on her behalf. Over time, I have watched a bright talent who had a successful exhibit at my Museum, become unnecessarily saddened and burdened with problems. All of which she had no control or involvement in creating, it is a public misinformation. Ms. Trombetta is the only artist on the internet that has her name and lives in New York.

Her opponents have demonstrated cruel tactics and unethical means in order to adversely affect Ms. Trombetta's rights and personal freedom. I kindly urge the Court to permit my testimony. Ms. Trombetta has been fighting to clear her name and I applaud her efforts. My involvement is in part, due to the moral imperative that is at stake in this case. No one should claim an artist painted an oil that they did not create. This has taken so many years to resolve this matter and is one of the reasons I agreed to give testimony on her behalf.

I add this letter to my others in April 2022 and my most recent letter on May 31, 2023. I sincerely hope Your Honor will permit my testimony in this case. Ms. Trombetta is well deserving and needs the support to prove her claims, defend her name and repair her reputation.

Sincerely,



Joseph V. Scelsa, Ed.D., LMHC

Administrative Office
1806 Hering Avenue
Bronx, NY 10461

Plaintiff's Expert Witness Report From Dr. Joseph V. Scelsa

Annamarie Trombetta <annamarietrombettalegal@outlook.com>

Thu 2/16/2023 10:51 PM

To: ajd@hoganduff.com <ajd@hoganduff.com>; Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S. <Jana.Farmer@wilsonelser.com>; Deplas, Alexandra <Alexandra.Deplas@wilsonelser.com>

4 attachments (13 MB)

Plaintiff Rule 26 (a) (2) for Expert Witness Dr. Joseph V. Scelsa .pdf; Dr.Joseph V.Scelsa Expert Witness Report A .pdf; EXHIBIT B Expert Witness Dr. Joseph V. Scelsa Curriculum Vitae.pdf; EXHIBIT C Exhibits for Expert Report Dr. Joseph V. Scelsa.pdf;

To All Parties,

Attached is Plaintiff's Rule 26 (a) (2) with

the Expert Witness Report from Dr. Joseph V. Scelsa.. Also an additional copy of his re`sume` and EXHIBITS that correlate to his report.

Regards,
Annamarie Trombetta

Re: Plaintiff Expert Witness Report from Gayle Skluzacek

Annamarie Trombetta <annamarietrombettalegal@outlook.com>

Wed 2/22/2023 11:15 AM

To: Farmer, Jana S. <Jana.Farmer@wilsonelser.com>; Bialek, Adam <adam.bialek@wilsonelser.com>; ajd@hoganduff.com <ajd@hoganduff.com>; Cahill, John <John.Cahill@wilsonelser.com>

2 attachments (709 KB)

Doc. 361 Dated Jan. 24, 2023 Judge Cave Order:Expert Discovery Dates.pdf; Doc.367 Feb. 3, 2023 Judge Cave's Order.pdf;

To All Parties,

Attached is Doc. 361 dated Jan. 24, 2023 which outlines March 1, 2023 as the end of Expert Discovery.

Secondly, is Doc. 367 dated Feb. 3, 2023 which outlines the my right to call at trial witnesses I proposed as experts.

You have received Expert Reports from Dr. Joseph V. Scelsa and from Art Appraiser Gayle M. Skluzacek.

If you do or do not depose them that is your decision. Plaintiff has furnished reports to all Defendants.

Submitted on Feb. 22, 2023

Sincerely,
Annamarie Trombetta

From: Farmer, Jana S. <Jana.Farmer@wilsonelser.com>
Sent: Tuesday, February 21, 2023 10:11 PM
To: Annamarie Trombetta <annamarietrombettalegal@outlook.com>; Bialek, Adam <Adam.Bialek@wilsonelser.com>; ajd@hoganduff.com <ajd@hoganduff.com>; Cahill, John <John.Cahill@wilsonelser.com>
Cc: Farmer, Jana S. <Jana.Farmer@wilsonelser.com>
Subject: RE: Plaintiff Expert Witness Report from Gayle Skluzacek

Ms. Trombetta,

This expert disclosure is rejected as untimely in light of multiple court orders denying your requests to extend your expert disclosure deadlines.

Jana S. Farmer
Attorney at Law
Wilson Elser Moskowitz Edelman & Dicker LLP
1133 Westchester Avenue
White Plains, NY 10604
914.872.7247 (Direct)
914.552.9644 (Cell)
914.323.7000 (Main)
914.323.7001 (Fax)
jana.farmer@wilsonelser.com

E X H I B I T A
18

In view of Your impossible non-monetary demands, Your monetary demands that would not be recoverable even if You prevailed on every one of Your claims against the EAI Defendants, Your rejection of the EAI Defendant's January 28, 2020 offer of judgment, and the pending motions for summary judgment, the EAI Defendants' counteroffer is as follows: (1) the EAI Defendants will agree not use your name, likeness, or artwork in a commercial fashion at any point in the future provided they may use your name, likeness, and artwork in a manner allowed by the relevant laws to accurately discuss this lawsuit and the circumstances leading to it (2) if You agree to dismiss all claims against the EAI Defendants with prejudice and (3) make a one-time payment of \$30,000 to the EAI Defendants to offset the costs they have incurred in their defense.

If we are unable to settle this action before a decision on the merits, the EAI Defendants intend to pursue an award of their attorneys' fees, which, as we have reminded You repeatedly during the past several years, will be much larger than the monetary demand above.

Respectfully submitted,

By: Anderson J. Duff

Dated: New York, New York
Annamarie Trombetta
175 East 96th Street (12 R)
New York, New York 10128
May 30, 2023

Respectfully Submitted by

—Electronic Signature —
/s/ Annamarie Trombetta

Annamarie Trombetta Pro Se Plaintiff